

**From:** Thurman, Nelson [Thurman.Nelson@epa.gov]  
**Sent:** 12/8/2020 4:27:39 PM  
**To:** Blankinship, Amy [Blankinship.Amy@epa.gov]; Kyle, Lee [Kyle.Lee@epa.gov]  
**CC:** Matuszko, Jan [Matuszko.Jan@epa.gov]  
**Subject:** RE: NMC cumulative drinking water and aldicarb  
**Attachments:** 098301 D333309 dwa aldicarb(rev2).doc

I realize we're meeting in a few minutes, but

**Ex. 5 Deliberative Process (DP)**

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**From:** Blankinship, Amy <Blankinship.Amy@epa.gov>  
**Sent:** Monday, December 7, 2020 1:31 PM  
**To:** Thurman, Nelson <Thurman.Nelson@epa.gov>; Kyle, Lee <Kyle.Lee@epa.gov>  
**Cc:** Matuszko, Jan <Matuszko.Jan@epa.gov>  
**Subject:** RE: NMC cumulative drinking water and aldicarb

Thank you Nelson,

I guess for me in terms of comparing numbers and approaches,

**Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

I've added Jan to this email string to keep her in the loop on this. For me, I think a meeting might help me talk this though as oppose to emails. I'll look for a 30 minute slot for tomorrow.

Amy

**From:** Thurman, Nelson <Thurman.Nelson@epa.gov>  
**Sent:** Monday, December 07, 2020 11:24 AM  
**To:** Blankinship, Amy <Blankinship.Amy@epa.gov>; Kyle, Lee <Kyle.Lee@epa.gov>  
**Subject:** RE: NMC cumulative drinking water and aldicarb

I think that summarizes what we discussed. However,

**Ex. 5 Deliberative Process (DP)**

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## Ex. 5 Deliberative Process (DP)

According to Carbamate usage table (beginning on pl 79), aldicarb had a PCT of 14% for oranges and 9% for grapefruit in South FL, 7-8% on oranges and grapefruit in Central FL, and 73% on grapefruit in lower TX.

## Ex. 5 Deliberative Process (DP)

Sorry for missing that the first times around

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

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**From:** Blankinship, Amy <Blankinship.Amy@epa.gov>

**Sent:** Monday, December 7, 2020 10:59 AM

**To:** Kyle, Lee <Kyle.Lee@epa.gov>; Thurman, Nelson <Thurman.Nelson@epa.gov>

**Subject:** RE: NMC cumulative drinking water and aldicarb

Thanks Lee and Nelson,

I can set up a short meeting to discuss this as well if that is easier. There is a follow up meeting with Alex on this action sometime this week.

Amy

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**From:** Kyle, Lee <Kyle.Lee@epa.gov>

**Sent:** Monday, December 07, 2020 10:57 AM

**To:** Thurman, Nelson <Thurman.Nelson@epa.gov>

**Cc:** Blankinship, Amy <Blankinship.Amy@epa.gov>

**Subject:** FW: NMC cumulative drinking water and aldicarb

**Importance:** High

Hi Nelson,

Are you able to take a look at this? Alex is asking about it

Thanks

Lee

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**From:** Blankinship, Amy

**Sent:** Thursday, December 03, 2020 5:52 PM

**To:** Thurman, Nelson <Thurman.Nelson@epa.gov>

**Cc:** Kyle, Lee <Kyle.Lee@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>

**Subject:** RE: NMC cumulative drinking water and aldicarb

Hi,

Thank you again for taking the time to help me work through the cumulative with me. Having time after my workshop to look at what you have sent around closer, my perspective is that

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

I can also set up a short meeting to discuss this as well, especially if that's easier. EFED/HED/BEAD are meeting with RD on this action again on Monday.

## Ex. 5 Deliberative Process (DP)

Thanks,  
Amy

**From:** Thurman, Nelson <Thurman.Nelson@epa.gov>  
**Sent:** Wednesday, December 02, 2020 3:42 PM  
**To:** Blankinship, Amy <Blankinship.Amy@epa.gov>  
**Cc:** Kyle, Lee <Kyle.Lee@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>  
**Subject:** RE: NMC cumulative drinking water and aldicarb

Amy,

## Ex. 5 Deliberative Process (DP)

Looking at the Table that begins on II.E.4-Page 79 in the appendix you attached and Table II.E.6-1, beginning on p. II.E.6-Page 99, you'll find the app rates used. For Aldicarb on oranges in FL, it looks like we used a rate of 3.85 lb ai/A (4.27 kg/ha) with 2 applications (121 days apart); for citrus (grapefruit) in TX, we used 4.69 lb ai/A (5.21 kg/ha) with 1 application.

## Ex. 5 Deliberative Process (DP)

### Ex. 5 Deliberative Process (DP)

Based on a footnote in Table II.E.6 (on p. 103), it looks like we assumed 15% of the applied aldicarb was available for runoff for in-furrow applications.

## Ex. 5 Deliberative Process (DP)

### Ex. 5 Deliberative Process (DP)

Unfortunately Dirk is out for the rest of the year, so I can't confirm that).

Looking at the table that follows (Table II.E.6-2), we were getting low, but non-zero, concentrations in SW for citrus (~90<sup>th</sup> %ile EDWCs of 0.004 ug/L in central FL and 0.002 ug/L in TX).

Based on that, I would say that,

## Ex. 5 Deliberative Process (DP)

Does that help?

Nelson

**From:** Blankinship, Amy <Blankinship.Amy@epa.gov>  
**Sent:** Wednesday, December 2, 2020 2:47 PM  
**To:** Thurman, Nelson <Thurman.Nelson@epa.gov>  
**Cc:** Kyle, Lee <Kyle.Lee@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>  
**Subject:** RE: NMC cumulative drinking water and aldicarb

Hi Nelson,

Sorry to bother you again, but

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

Is this something you could help me with? I was also trying to confirm if there was assumed zero runoff if it was modeled at a certain depth.

Thanks,  
Amy

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**From:** Blankinship, Amy  
**Sent:** Monday, November 30, 2020 5:13 PM  
**To:** Thurman, Nelson <[Thurman.Nelson@epa.gov](mailto:Thurman.Nelson@epa.gov)>  
**Cc:** Kyle, Lee <[Kyle.Lee@epa.gov](mailto:Kyle.Lee@epa.gov)>; Anderson, Brian <[Anderson.Brian@epa.gov](mailto:Anderson.Brian@epa.gov)>  
**Subject:** RE: NMC cumulative drinking water and aldicarb

Thank you Nelson for these responses. We went back to the docket to retrieve the appendix with the DWA that I've attached here for your reference. I couldn't quite find what application rate we used for aldicarb in this assessment, but I suspect I'm just not looking in the right place.

## Ex. 5 Deliberative Process (DP)

As this progresses, I may need to call on your knowledge again, but thanks for this as a start.

Amy

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**From:** Thurman, Nelson <[Thurman.Nelson@epa.gov](mailto:Thurman.Nelson@epa.gov)>  
**Sent:** Monday, November 30, 2020 3:50 PM  
**To:** Blankinship, Amy <[Blankinship.Amy@epa.gov](mailto:Blankinship.Amy@epa.gov)>  
**Cc:** Kyle, Lee <[Kyle.Lee@epa.gov](mailto:Kyle.Lee@epa.gov)>; Anderson, Brian <[Anderson.Brian@epa.gov](mailto:Anderson.Brian@epa.gov)>  
**Subject:** RE: NMC cumulative drinking water and aldicarb

Amy,

I'm amazed at how many email were waiting for me when I got back (I figured most folks would take most of last week off, but apparently not).

Here are my responses to your questions (as near as I can recall... that's going back in time and I may not have dusted off all of the cobwebs):

1.

## Ex. 5 Deliberative Process (DP)

2.  
  
3.  
  
4.

## Ex. 5 Deliberative Process (DP)

Digging into the questions in the original email:

## Ex. 5 Deliberative Process (DP)

Hope that helps. Let me know if you have more questions.

Nelson

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**From:** Blankinship, Amy <[Blankinship.Amy@epa.gov](mailto:Blankinship.Amy@epa.gov)>  
**Sent:** Monday, November 30, 2020 11:33 AM  
**To:** Thurman, Nelson <[Thurman.Nelson@epa.gov](mailto:Thurman.Nelson@epa.gov)>  
**Cc:** Kyle, Lee <[Kyle.Lee@epa.gov](mailto:Kyle.Lee@epa.gov)>; Anderson, Brian <[Anderson.Brian@epa.gov](mailto:Anderson.Brian@epa.gov)>  
**Subject:** RE: NMC cumulative drinking water and aldicarb

Hi Nelson,

I know you are just getting back into the office after being off last week, but I wanted to get this email back on the top of your list, since this is a time sensitive issue for our team.

The main questions are

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Some things I was trying to confirm was

1.  
2.  
3.  
4.

## Ex. 5 Deliberative Process (DP)

Thanks,  
Amy

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**From:** Blankinship, Amy  
**Sent:** Tuesday, November 24, 2020 9:10 AM  
**To:** Thurman, Nelson <[Thurman.Nelson@epa.gov](mailto:Thurman.Nelson@epa.gov)>

Cc: Kyle, Lee <Kyle.Lee@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>

Subject: NMC cumulative drinking water and aldicarb

Hi Nelson,

Our team has a new proposed action for aldicarb that we are working through – aldicarb use on citrus in FL/TX. In working on this action, the question of

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

First question posed was

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

For our action – currently we are

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

I know that you are off this week, but hopefully we can schedule a meeting next week to talk through our questions.

Thanks,  
Amy

Amy Blankinship  
Branch Chief, ERB2  
USEPA – OCSPP/OPP/EFED  
703-347-8062